

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption In Compliance With D.N.J. LBR 9004-1

CLYDE & CO US LLP

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*Attorneys for The Continental Insurance
Company, as successor in interest to Harbor
Insurance Company and London Guarantee and
Accident Company of New York*

In Re:

LTL MANAGEMENT, LLC,

Debtor.

Chapter 11

Case No. 23-12825 (MBK)

Judge: Hon. Michael B. Kaplan

**APPLICATION FOR AN ORDER FOR ADMISSION
PRO HAC VICE OF DAVID CHRISTIAN, ESQ.**

Pursuant to Rule 101.1 of the Local Civil Rules for the United States District Court for the District of New Jersey and Rule 9010-1 of the United States Bankruptcy Court for the District of New Jersey, the undersigned counsel hereby seeks entry of an order granting the admission *pro hac vice* of David Christian, of the law firm David Christian Attorneys LLC, 105 West Madison Street, Suite 1400, Chicago, IL, 60602, to represent The Continental Insurance Company, as successor in interest to Harbor Insurance Company and London Guarantee and Accident Company of New York, in the above-captioned chapter 11 case.

In support of the application, counsel submits the attached Certification of David Christian, and requests that the proposed form of order submitted herewith be entered. Undersigned counsel certifies that he is admitted and a member in good standing of the United States District Court for the District of New Jersey.

Unless requested by other parties, no oral argument is requested. A proposed form of Order is submitted herewith.

Dated: April 18, 2023

CLYDE & CO US LLP

By: /s/ Konrad R. Krebs
Konrad R. Krebs (NJ Bar No. 118882014)
340 Mt. Kemble Ave., Suite 300
Morristown, NJ 07960
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Attorneys for The Continental Insurance Company, as successor in interest to Harbor Insurance Company and London Guarantee and Accident Company of New York

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**CERTIFIED STATEMENT OF DAVID CHRISTIAN, ESQ. IN SUPPORT OF
APPLICATION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 9010-1 of the Local Rules of the United States Bankruptcy Court, District of New Jersey, in support of his application for admission *pro hac vice*, David Christian certifies as follows:

1. I am admitted to practice and am a member in good standing of the following state and federal bars: Missouri (1998), Kansas (1999), and Illinois (2001); Supreme Court of the United States (2009); United States Court of Appeals for the Third Circuit (2006), United States Court of Appeals for the Seventh Circuit (2009), United States Court of Appeals for the Eighth Circuit (2005), United States Court of Appeals for the Ninth Circuit (2009), and United States

Court of Appeals for the Tenth Circuit (1999); and Western District of Missouri (1998), Eastern District of Missouri (1998), District of Kansas (1998), Northern District of Illinois (2001), Eastern District of Wisconsin (2005), and Eastern District of Michigan (2007).

2. I was previously authorized to appear *pro hac vice* in this court with respect to the *In re LTL Management* bankruptcy under Case No. 21-30589. A copy of the *Order Allowing Motion for Admission to Practice Pro Hac Vice of David Christian* [ECF No. 1515], entered on February 17, 2022, is attached hereto as **Exhibit A**.

3. There are no disciplinary proceedings pending against me.

4. Discipline has not been imposed on me during the five-year period preceding this application.

5. I have obtained a copy of the Local Bankruptcy Rules and am generally familiar with such rules. I will comply with all court and ethical rules governing the practice of law before this court.

6. I further agree to pay all fees to the Clerk of the United States District Court for the District of New Jersey and the Lawyer's Fund for Client Protection as provided in Rule 101.1 of the Local Rules of the United States District Court for the District of New Jersey.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 18, 2023

DAVID CHRISTIAN ATTORNEYS LLC

By: /s/ David Christian
David Christian, Esq.
105 W. Madison St., Suite 1400
Chicago, IL 60602
Telephone: 312-282-5282
Email: dchristian@dca.law

Attorneys for The Continental Insurance Company, as successor in interest to Harbor Insurance Company and London Guarantee and Accident Company of New York

EXHIBIT A

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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CLYDE & CO US LLP Konrad R. Krebs, Esq. 340 Mt. Kemble Ave., Suite 300 Morristown, NJ 07960 Telephone: (973) 210-6705 E-mail: konrad.krebs@clydeco.us	
-and-	
DAVID CHRISTIAN ATTORNEYS LLC David Christian, Esq. (<i>pro hac vice</i>) 105 W. Madison St., Suite 1400 Chicago, IL 60602 Telephone: (862) 362-8605 Email: dchristian@dca.law	
<i>Attorneys for The Continental Insurance Company, as successor in interest to Harbor Insurance Company and London Guarantee and Accident Company of New York</i>	
In Re:	Chapter 11
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Debtor.	Judge: Hon. Michael B. Kaplan

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is hereby **ORDERED**.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc. 78, D.N.J. L. Civ. R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that **David Christian, Esq.** be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of

this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States Bankruptcy Court for the District of New Jersey at the following address, for forwarding by the Clerk to the District Court:

United States Bankruptcy Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07102
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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CERTIFICATE OF SERVICE

I hereby certify that on the date below I caused a true and correct copy of the foregoing APPLICATION FOR ADMISSION PRO HAC VICE PURSUANT TO RULE 9010-1(B) to be filed electronically and that the same is available for viewing through the Court's ECF system.

Dated: April 18, 2023

CLYDE & CO US LLP

By: /s/ Konrad R. Krebs
Konrad R. Krebs (NJ Bar No. 118882014)
340 Mt. Kemble Ave., Suite 300
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